

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PLANET TECHNOLOGIES, INC.,

Plaintiff,

vs.

PLANET TECHNOLOGY LLC and  
PEG HOLDCO, INC. d/b/a THE  
PLANET GROUP,

Defendants.

CASE NO. 1:23-CV-07071

HON. VIRGINIA M. KENDALL

**JURY TRIAL DEMANDED**

**JOINT MOTION FOR EXTENSION OF DEADLINES**

Plaintiff Planet Technologies, Inc. (“Plaintiff” or “PTI”), and Defendants Planet Technology LLC and PEG Holdco, Inc. d/b/a The Planet Group (“Defendant” or (“PTLLC”), respectfully jointly move the Court to extend the deadlines in this matter by 60 days. This is the Parties’ first request for an extension.

Good cause exists for the extension because counsel for the parties have focused their time over the past three months negotiating a settlement. The parties believe they are close to agreeing on a final settlement, but the settlement likely will not be finalized before August 30, 2024, the deadline for the close of fact discovery. Moreover, if the parties are unable to reach an agreement resolving the case, additional time is needed to complete discovery.

Accordingly, the Parties respectfully request that the Court extend the deadline for the close of fact discovery by 60 days, to October 29, 2024. Further, for the same reasons, the Parties jointly request that the Fact Discovery Status hearing

currently scheduled for September 11, 2024, also be continued until a date after October 29, 2024, and that expert and dispositive motion deadlines be similarly extended as follows:

Expert disclosure deadline: extended from 10/1/24 to 12/2/24

Rebuttal expert disclosure deadline: extended from 12/6/24 to 2/6/25

Expert deposition deadline: extended from 1/31/25 to 3/31/25

Dispositive motions deadline: extended from 3/28/25 to 5/28/25

The parties will also be jointly moving to continue to the settlement conference scheduled in this matter for September 11, 2024 by 60 days as well.

Respectfully submitted this 26<sup>th</sup> day of August, 2024.

By: /s/ Steven Barentzen (with permission)

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